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November 3, 2021

Via Ecf

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

MEMO ENDORSED

Re: Johnny Figueroa v. City of New York, et al.,
19-Civ.-11178 (KPF) (KHP)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York ("City"), and the attorney for defendants City and David Dmitri in the above-referenced action.¹ I write pursuant to the Court's Order of October 4, 2021, to respectfully request that the Court extend the time for the parties to submit their dismissal stipulation by one week – from November 3, 2021, to November 10, 2021.

This request is made due to counsel for City's prior absence from the office and because the parties now require additional time to review and approve the settlement stipulation. The settlement stipulation is of above-average complexity because it involves contributions by multiple defendants and a back-pay component which should be accounted for in plaintiff's salary and benefits. The parties have been in communication, exchanged drafts of settlement papers, and expect to reach agreement within one week.

We thank the Court for its consideration in this matter.

Respectfully submitted,
Alan H. Scheiner /s/
Alan H. Scheiner
Senior Counsel

¹ Two additional individual defendants, Mary Padovano and Giovanni Caggia, are separately represented and join in this request.

Application GRANTED.

Dated: November 4, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE